

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)</b>

**CERTIFICATION OF ADAM M. SLATER  
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO  
ZHP DEFENDANTS' MOTION TO AMEND OR CORRECT  
THE COURT'S OPINION ON THE PARTIES' LIABILITY EXPERTS  
AND PLAINTIFFS' CROSS MOTION TO EXCLUDE DR. AFNAN'S  
OPINIONS THAT RELY ON DR. XUE'S EXCLUDED OPINIONS**

**ADAM M. SLATER**, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in support of Plaintiffs' opposition to the ZHP Defendants' motion to amend or correct the Court's opinion on the Parties' liability experts and Plaintiffs' cross motion to exclude Dr. Afnan's opinions that rely on Dr. Xue's excluded opinions.

2. Attached hereto as **Exhibit 1** is a true and accurate copy of the Amended Report of Ali Afnan in this case.

3. Attached hereto as **Exhibit 2** is a true and accurate copy of the deposition transcript of Ali Afnan in this case.

4. Attached hereto as **Exhibit 3** is a true and accurate copy of the FDA's December 5, 2022 Letter to Valisure, LLC.

5. Attached hereto as **Exhibit 4** is a true and accurate copy of the transcript of Fengtian Xue's February 3, 2023 deposition in this case.

6. Attached hereto as **Exhibit 5** is a true and accurate copy of Dr. Najafi's October 31, 2022 Expert Report.

7. Attached hereto as **Exhibit 6** is a true and accurate copy of Dr. Plunkett's October 31, 2022 Expert Report.

8. Attached hereto as **Exhibit 7** is a true and accurate copy of the transcript of Peng Dong's March 29, 2021 deposition in this case.

9. Attached hereto as **Exhibit 8** is a true and accurate copy of the transcript of Hai Wang's March 10, 2021 deposition in this case.

10. Attached hereto as **Exhibit 9** is a true and accurate copy of the FDA's Preface to the Orange Book, <https://www.fda.gov/drugs/development-approval-process-drugs/orange-book-preface>.

11. Attached hereto as **Exhibit 10** is a true and accurate copy of the FDA's Warning Letter to ZHP (PRINSTON00077339).

12. Attached hereto as **Exhibit 11** is a true and accurate copy of the transcript of Jucai Ge's May 26, 2022 deposition in this case.

13. Attached hereto as **Exhibit 12** is a true and accurate copy of ZHP's translation of Jinsheng Lin's July 27, 2017 email regarding the NDMA contamination of ZHP's valsartan (ZHP00190573).

14. Attached hereto as **Exhibit 13** is a true and accurate copy of the transcript of Min Li's April 20, 2021 deposition in this case.

15. Attached hereto as **Exhibit 14** is a true and accurate copy of ZHP's Investigation Regarding Unknown Impurity (Genotoxic Impurity) of Valsartan API (Version 2) (PRINSTON00075797).

16. Attached hereto as **Exhibit 15** is a true and accurate copy of ZHP's Investigation Regarding Unknown Impurity (Genotoxic Impurity) of Valsartan API (Version 3) (PRINSTON0076100).

**MAZIE SLATER KATZ & FREEMAN, LLC**  
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 6, 2024